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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)	MDL No. 2804
PRESCRIPTION OPIATE)	
LITIGATION,)	Case No.
)	1:17-MD-2804
)	
THIS DOCUMENT RELATES TO)	Hon. Dan A.
ALL CASES)	Polster
)	

— — —
Tuesday, January 15, 2019
— — —

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CONFIDENTIALITY REVIEW
— — —

Videotaped Deposition of GREGORY BEAM,
held at 4206 South J.B. Hunt Drive, Rogers,
Arkansas, commencing at 8:36 a.m., on the
above date, before Debra A. Dibble, Certified
Court Reporter, Registered Diplomate
Reporter, Certified Realtime Captioner,
Certified Realtime Reporter and Notary
Public.

— — —
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<p>1 WRIGHT, LINDSEY & JENNINGS, LLP</p> <p>2 BY: CALEY B VO, ESQUIRE</p> <p>3 cvo@wlj.com</p> <p>4 3333 Pinnacle Hills Parkway</p> <p>5 Suite 510</p> <p>6 Rogers, Arkansas 72758-8498</p> <p>7 (479) 986-0888</p> <p>8 Counsel for McKesson</p> <p>9 O'MELVENY & MYERS LLP</p> <p>10 (appearing telephonically)</p> <p>11 BY: Ryan J Snyder, ESQUIRE</p> <p>12 rsnyder@omm.com</p> <p>13 1999 Ave of The Stars, 8FL</p> <p>14 Los Angeles, CA 90067</p> <p>15 (310) 246-6705</p> <p>16 Counsel for Janssen and Johnson & Johnson</p> <p>17 JACKSON KELLY, PLLC</p> <p>18 (appearing telephonically)</p> <p>19 BY: JON ANDERSON, ESQUIRE</p> <p>20 janderson@jacksonkelly.com</p> <p>21 500 Lee Street East</p> <p>22 Suite 1600</p> <p>23 Charleston, WV 25301-3202</p> <p>24 (304) 340-1288</p> <p>25 Counsel for AmerisourceBergen</p> <p>ARNOLD & PORTER KAYE SCHOLER, LLP</p> <p>(appearing telephonically)</p> <p>BY: HEATHER A. HOSMER, ESQUIRE</p> <p>hhosmer@arnoldporter.com</p> <p>601 Massachusetts Ave, NW</p> <p>Washington, DC 20001-3743</p> <p>(202) 942-5000</p> <p>Counsel for Endo Health Solutions Inc ;</p> <p>Endo Pharmaceuticals Inc ; Par</p> <p>Pharmaceuticals, Inc ; Par</p> <p>Pharmaceutical Companies, Inc formerly</p> <p>known as Par Pharmaceutical Holdings,</p> <p>Inc</p>	<p>1 INDEX</p> <p>2</p> <p>3 APPEARANCES 2</p> <p>4</p> <p>5 PROCEEDINGS 8</p> <p>6</p> <p>7 EXAMINATION OF GREGORY BEAM:</p> <p>8 DIRECT EXAMINATION 10</p> <p>9 BY MR. ECKLUND</p> <p>10</p> <p>11 CERTIFICATE 384</p> <p>12 ERRATA 386</p> <p>13 ACKNOWLEDGMENT OF DEPONENT 387</p> <p>14 LAWYER'S NOTES 388</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p>1 DEPOSITION EXHIBITS 2 GREGORY BEAM 3 JANUARY 15, 2019 4 NUMBER DESCRIPTION PAGE 5 WALMART- ANNUAL PERFORMANCE REVIEWS 15 6 BEAM FOR GREGORY BEAM 7 EXHIBIT 1 WMT_MDL_000057274-57362 8 WALMART- SEPTEMBER 2010 EMAIL 88 9 BEAM SUBJ: RE: DEA AUDIT AT DC 10 EXHIBIT 2 6013 11 WMT_MDL_000057259-57260 12 13 WALMART- MARCH 2012 EMAIL CHAIN 109 14 BEAM WMT_MDL_000054729-54731 15 EXHIBIT 3 16 17 WALMART- 7-25-12 EMAIL FROM SUSANNE 125 18 BEAM HILAND SUBJ: CS POA 19 EXHIBIT 4 WMT_MDL_000009427-9428 20 21 WALMART- SEPTEMBER 2012 EMAIL CHAIN 203 22 BEAM SUBJ: RE: CII UTILIZATION 23 EXHIBIT 5 REVIEW 24 WMT_MDL_000008089-8090, 5/10/13 EMAIL FROM SHIRLEY 222 BEAM RECTOR SUBJ: CSMP EXHIBIT 6 QUESTIONNAIRE MCKMDL00514052-514057 JULY 2013 EMAIL CHAIN 233 BEAM SUBJ: JUNE 405-1 REPORT EXHIBIT 7 WMT_MDL_000042794-42795 WITH ATTACHMENT</p>	<p>1 PROCEEDINGS 2 (January 15, 2019 at 8:36 a.m.) 3 THE VIDEOGRAPHER: We are now 4 on the record. My name is 5 Chris Ritona. I am the videographer 6 for Golkow Litigation Services. 7 Today's date is January 15th, 2019. 8 The time is approximately 8:36 a.m. 9 This video deposition is being held in 10 Rogers, Arkansas, at Mitchell 11 Williams, 4206 South J.B. Hunt Drive, 12 Suite 200 in the matter of National 13 Prescription Opioid Litigation MDL 14 No. 2084, Case No. 17-MD-2084 in the 15 United States District Court, Northern 16 District of Ohio, Eastern Division. 17 The deponent today is Greg 18 Beam. Will all counsel please 19 identify themselves for the record? 20 MR. ECKLUND: Good morning. 21 Don Ecklund from Carella Byrne on 22 behalf of plaintiffs in the MDL. 23 MR. GILFILLAN: David Gilfillan 24 from Carella Byrne on behalf of 25 plaintiffs.</p>
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<p>1 WALMART- 10-16-14 EMAIL FROM JEFF 260 2 BEAM ABERNATHY SUBJ: OVER 3 EXHIBIT 8 20/50 REPORT 4 WMT_MDL_000018858-18859 5 WITH ATTACHMENT 6 WALMART- 10-16-14 EMAIL FROM JEFF 260 7 BEAM ABERNATHY SUBJ: OVER 8 EXHIBIT 9 20/50 REPORT 9 WMT_MDL_000018862-18863 10 11 WALMART- JUNE 2014 SUBJ: RE: CUT 319 12 BEAM REPORT FROM D C 13 EXHIBIT 10 WMT_MDL_000008419 14 15 WALMART- SEPTEMBER 2017 EMAIL CHAIN 327 16 BEAM SUBJ: RE: ARCHER QUESTION 17 EXHIBIT 11 WMT_MDL_0000073917394 18 19 WALMART- 9/28/17 EMAIL FROM BRANDI 336 20 BEAM WILLIAMSON 21 EXHIBIT 12 WMT_MDL_000030095-30114 22 23 WALMART- SEPTEMBER 2015 EMAIL CHAIN 342 24 BEAM SUBJ: RE: SOM EVALUATION EXHIBIT 13 NOTIFICATIONS WMT_MDL_000016816 WALMART- SEPTEMBER 25 EMAIL CHAIN 350 BEAM SUBJ: SIGNIFICANT EXHIBIT 14 COMPLIANCE ISSUES WMT_MDL_000047185-47187</p>	<p>1 MR. CECCHI: Jim Cecchi at 2 Carella Byrne on behalf of plaintiffs. 3 MR. VO: Caley Vo from Wright, 4 Lindsey & Jennings on behalf of 5 McKesson. 6 MR. STALLINGS: Evan Stallings 7 with Barber Law Firm on behalf of 8 Cardinal Health. 9 MR. MORRIS: Paul Morris from 10 Walmart legal. 11 MR. MITCHELL: Greg Mitchell, 12 Jones Day on behalf of Walmart. 13 MR. VARNADO: Jason Varnado 14 with Jones Day on behalf of Walmart 15 and the witness. 16 THE VIDEOGRAPHER: Will all 17 counsel -- 18 MR. HALPERN: Rick Halpern, 19 Marcus & Shapira on behalf of HBC. 20 MS. HOSMER: Heather Hosmer of 21 Arnold & Porter on behalf of Endo and 22 Par defendants. 23 MS. MARINO: Christina Marino 24 of Tucker and Ellis appearing on 25 behalf of Johnson & Johnson and</p>

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<p style="text-align: right;">Page 10</p> <p>1 Janssen.</p> <p>2 MR. ANDERSON: Jon Anderson,</p> <p>3 Jackson Kelly on behalf of</p> <p>4 AmerisourceBergen.</p> <p>5 VIDEOGRAPHER: The court</p> <p>6 reporter today, Debbie Dibble, will</p> <p>7 please swear in the witness.</p> <p>8 GREGORY BEAM,</p> <p>9 having first been duly sworn, was examined</p> <p>10 and testified as follows:</p> <p>11 DIRECT EXAMINATION</p> <p>12 BY MR. ECKLUND:</p> <p>13 Q. Good morning, Mr. Beam.</p> <p>14 Moments ago the court reporter asked you to</p> <p>15 take an oath. What does that oath mean to</p> <p>16 you today?</p> <p>17 A. That means under perjury of</p> <p>18 law, I am bound to tell the truth.</p> <p>19 Q. And the whole truth?</p> <p>20 A. The whole truth.</p> <p>21 Q. Everything that you can recall,</p> <p>22 your entire recollection?</p> <p>23 A. Yes, sir.</p> <p>24 Q. So throughout the day, that's</p> <p>25 the expectation.</p>	<p style="text-align: right;">Page 12</p> <p>1 understand a question, just let me know.</p> <p>2 I'll try to rephrase it. If you answer the</p> <p>3 question, I'll assume you understood what I</p> <p>4 was asking you about. Is that fair?</p> <p>5 A. That's fair.</p> <p>6 Q. During the day if you want to</p> <p>7 take a break, you need to stretch your legs,</p> <p>8 you can stand up. I'm not concerned about</p> <p>9 that. Any pending questions, we can answer</p> <p>10 it and we'll try to get you that break. Or I</p> <p>11 might try to finish up a line of examination.</p> <p>12 Is that fair?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Any reason today why you --</p> <p>15 MS. HOSMER: I'm sorry to</p> <p>16 interrupt. There is about a 90-second lag</p> <p>17 time with the online video. Is there any way</p> <p>18 to fix that?</p> <p>19 (Discussion off the record.)</p> <p>20 Q. (BY MR. ECKLUND) Okay. So, if</p> <p>21 at any point during the deposition you think</p> <p>22 you may need to review a document when you're</p> <p>23 going to answer a question that I'm going to</p> <p>24 ask you, there's a chance that I might have</p> <p>25 the document in the box that we brought here</p>
<p style="text-align: right;">Page 11</p> <p>1 Full disclosure, whatever you</p> <p>2 can remember. Fair?</p> <p>3 A. Fair.</p> <p>4 Q. Okay. Have you ever been</p> <p>5 deposed before?</p> <p>6 A. Sir?</p> <p>7 Q. Have you ever been deposed</p> <p>8 before? First deposition?</p> <p>9 A. I have.</p> <p>10 Q. How many times?</p> <p>11 A. Multiple times. I can't recall</p> <p>12 an exact.</p> <p>13 Q. More than ten?</p> <p>14 A. In criminal and civil, yes.</p> <p>15 Q. More than 20?</p> <p>16 A. No.</p> <p>17 Q. Okay. So you're fairly</p> <p>18 familiar with the process?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Throughout the day I'll be</p> <p>21 asking you questions. Your attorney may at</p> <p>22 points in time interject an objection. If we</p> <p>23 could both try to give breaks in between when</p> <p>24 we're speaking it will help the court</p> <p>25 reporter take a record. If you don't</p>	<p style="text-align: right;">Page 13</p> <p>1 today. There's also a chance that your</p> <p>2 lawyers may be able to locate that document</p> <p>3 if you describe it. So if you need</p> <p>4 something, say something about the document</p> <p>5 you need. Describe it. What was it? Is it</p> <p>6 an Excel? Is it a PowerPoint? Is it an</p> <p>7 email? Okay?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Policies. Whatever it may be.</p> <p>10 And we'll try to get that for you. Okay?</p> <p>11 This isn't intended to be a memory</p> <p>12 examination. It's intended to be a</p> <p>13 fact-finding examination.</p> <p>14 So if there's a document that's</p> <p>15 going to help you answer questions for us</p> <p>16 today, we want you to have those documents.</p> <p>17 But it's on you to tell us what that document</p> <p>18 looks like and that you need it.</p> <p>19 Is that fair?</p> <p>20 A. Yes, sir.</p> <p>21 Q. What did you do to prepare for</p> <p>22 your deposition today?</p> <p>23 A. I met with counsel.</p> <p>24 Q. How many times?</p> <p>25 A. Over a period of three days.</p>

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<p>1 Q. In person? Telephone?</p> <p>2 A. In person.</p> <p>3 Q. Video trainings?</p> <p>4 A. Video trainings?</p> <p>5 Q. Did you watch any videos about</p> <p>6 how to sit for a deposition?</p> <p>7 A. No.</p> <p>8 Q. Read any manuals about how to</p> <p>9 answer questions?</p> <p>10 A. No.</p> <p>11 Q. Review any of your documents</p> <p>12 within your files to prepare for today?</p> <p>13 A. We did.</p> <p>14 Q. Approximately how long did you</p> <p>15 spend reviewing documents to get ready for</p> <p>16 today's deposition?</p> <p>17 A. Total time?</p> <p>18 Q. Total time?</p> <p>19 A. Approximately 15, 16 hours.</p> <p>20 Q. When did you start that</p> <p>21 process?</p> <p>22 A. Last Thursday.</p> <p>23 Q. Did you meet the attorneys</p> <p>24 before or after you started that process?</p> <p>25 A. That was during those meetings</p>	<p>1 Bates number into the record, please?</p> <p>2 MR. ECKLUND: 57274. And it</p> <p>3 ends at 57362.</p> <p>4 MS. HOSMER: Thank you.</p> <p>5 MR. ECKLUND: You're welcome.</p> <p>6 Mr. Beam, why don't you just</p> <p>7 skip to the end, the last page or two,</p> <p>8 and just verify this is a complete</p> <p>9 collection of all of your evaluation</p> <p>10 forms.</p> <p>11 MR. VARNADO: Object to the</p> <p>12 form.</p> <p>13 THE WITNESS: I see fiscal</p> <p>14 years '12 through '18.</p> <p>15 Q. (BY MR. ECKLUND) Are any</p> <p>16 missing?</p> <p>17 A. None between those years, no,</p> <p>18 sir.</p> <p>19 Q. Does it seem incomplete in any</p> <p>20 way?</p> <p>21 A. I do not detect anything</p> <p>22 incomplete at this time.</p> <p>23 Q. Great.</p> <p>24 Okay. Let's start on the first</p> <p>25 page.</p>
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<p>1 with the attorneys.</p> <p>2 Q. Okay. What's your current</p> <p>3 title within Walmart?</p> <p>4 A. I'm -- current title is</p> <p>5 director of global investigations.</p> <p>6 Q. And when did you get that</p> <p>7 title?</p> <p>8 A. Approximately 2011.</p> <p>9 Q. Let me hand you a document</p> <p>10 that's going to be marked as Exhibit 1.</p> <p>11 You may have seen these, or at</p> <p>12 least portions of them. These are</p> <p>13 performance evaluations from within Walmart.</p> <p>14 (Walmart-Beam Deposition</p> <p>15 Exhibit 1, Annual Performance Reviews</p> <p>16 for Gregory Beam, WMT_MDL_000057274-</p> <p>17 57362, was marked for identification.)</p> <p>18 MR. CECCHI: We'll refer to</p> <p>19 them as Beam 1 and then seriatim after</p> <p>20 that.</p> <p>21 Q. (BY MR. ECKLUND) So why don't</p> <p>22 you take a moment to peruse them quickly.</p> <p>23 You don't need to review the whole thing</p> <p>24 closely.</p> <p>25 MS. HOSMER: Will you read the</p>	<p>1 February 1st, 2011. Is that</p> <p>2 when you started at Walmart?</p> <p>3 A. No, sir.</p> <p>4 Q. When did you start at Walmart?</p> <p>5 A. I started October of 2006.</p> <p>6 Q. And what was your title in</p> <p>7 October 2006?</p> <p>8 A. In October 2006, I hired as a</p> <p>9 drug diversion coordinator.</p> <p>10 Q. And was that your first</p> <p>11 occasion as a drug diversion coordinator, or</p> <p>12 did you come from another company with that</p> <p>13 experience?</p> <p>14 A. I came from another company as</p> <p>15 a district loss prevention supervisor.</p> <p>16 Q. Which company?</p> <p>17 A. Walgreens.</p> <p>18 Q. And within Walgreens, were you</p> <p>19 responsible for drug diversion?</p> <p>20 A. Among other things, yes.</p> <p>21 Q. What other responsibilities did</p> <p>22 you have within Walgreens?</p> <p>23 A. We had theft. Shrink. As well</p> <p>24 as HR and employees relations matter.</p> <p>25 Q. When you talk about theft, are</p>

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<p>1 you talking specifically about theft of</p> <p>2 controlled substances or theft generally?</p> <p>3 A. Theft in general.</p> <p>4 Q. And what do you mean by</p> <p>5 "shrink"?</p> <p>6 A. "Shrink" meaning stores that</p> <p>7 are losing product without sales.</p> <p>8 Q. And that's a variation of</p> <p>9 theft?</p> <p>10 A. It's also a variation of a</p> <p>11 combination of other things. It could be</p> <p>12 shrinkage. It could be customer theft. And</p> <p>13 it could also be reduction in price,</p> <p>14 blowouts, sale blow costs. There's a lot of</p> <p>15 different things that contribute to shrink.</p> <p>16 Q. Okay.</p> <p>17 And what was your role</p> <p>18 concerning HR?</p> <p>19 A. These were HR investigations</p> <p>20 that were telephoned in to corporate</p> <p>21 headquarters. Corporate headquarters would</p> <p>22 in turn reassign those to an HR as well as</p> <p>23 loss prevention supervisor for that location.</p> <p>24 Q. And just so that the record is</p> <p>25 clear on all of this, because I haven't asked</p>	<p>1 Q. Air Force. And you were in the</p> <p>2 Air Force for approximately 20 years?</p> <p>3 A. Correct.</p> <p>4 Q. And when you left, what was</p> <p>5 your -- what was your title and what were you</p> <p>6 doing within the Air Force?</p> <p>7 A. I was a special agent,</p> <p>8 Air Force Office of Special Investigations.</p> <p>9 Q. And what type of investigations</p> <p>10 were you doing within the Air Force?</p> <p>11 A. A variety of investigations.</p> <p>12 Criminal investigations ranging from rape,</p> <p>13 homicides, theft.</p> <p>14 Q. Did you receive any training</p> <p>15 within the Air Force to conduct those</p> <p>16 investigations?</p> <p>17 A. I did.</p> <p>18 Q. What type of training did you</p> <p>19 receive?</p> <p>20 A. It was 12-week investigations,</p> <p>21 basic investigations academia course.</p> <p>22 Q. Any continuing education</p> <p>23 following the 12-week program you started</p> <p>24 with?</p> <p>25 A. Yes. We had advanced</p>
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<p>1 you and I probably should have, can I have</p> <p>2 the benefit of your full educational history</p> <p>3 after high school?</p> <p>4 A. Sure. I graduated bachelor of</p> <p>5 science, criminal justice and security</p> <p>6 management, Capella University.</p> <p>7 Q. Any certifications following</p> <p>8 college?</p> <p>9 A. No, sir.</p> <p>10 Q. Additional graduate school?</p> <p>11 A. No, sir.</p> <p>12 Q. Military service?</p> <p>13 A. Military service, yes.</p> <p>14 Q. When did you serve?</p> <p>15 A. From 1979 to 1999.</p> <p>16 Q. When did you graduate from</p> <p>17 college?</p> <p>18 A. I graduated from college 2014,</p> <p>19 finally.</p> <p>20 Q. When did you start college?</p> <p>21 A. Gosh, 2006.</p> <p>22 Q. Okay. So you left high school,</p> <p>23 went into the armed services, and which</p> <p>24 branch?</p> <p>25 A. Air Force.</p>	<p>1 investigation school. Also went to fire bomb</p> <p>2 and arson school. Also had completed</p> <p>3 protective services operations school.</p> <p>4 Q. What was your rank when you</p> <p>5 left the Air Force?</p> <p>6 A. I was an E7.</p> <p>7 Q. E7?</p> <p>8 A. E7, master sergeant.</p> <p>9 Q. Master sergeant. Thank you.</p> <p>10 MS. HOSMER: I'm sorry to</p> <p>11 interrupt. I can't hear the witness</p> <p>12 at all.</p> <p>13 MS. MARINO: I'm also having</p> <p>14 difficulty hearing.</p> <p>15 Q. (BY MR. ECKLUND) So let's talk</p> <p>16 a little bit about the training you received</p> <p>17 more than 20 years ago concerning an</p> <p>18 investigation in advanced investigation</p> <p>19 school.</p> <p>20 At that time, what were you</p> <p>21 told are some of the core principles of a</p> <p>22 thorough investigation?</p> <p>23 MR. VARNADO: Object to the</p> <p>24 form.</p> <p>25 THE WITNESS: First we go</p>

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<p>1 through, and you'd want to identify</p> <p>2 the crime scene. And at that</p> <p>3 particular point, you take meticulous</p> <p>4 notes and you photograph the scene or</p> <p>5 draft it out.</p> <p>6 Q. (BY MR. ECKLUND) Do you share</p> <p>7 the meticulous notes with other people?</p> <p>8 A. As lead investigator, you would</p> <p>9 share that information with others arriving</p> <p>10 on the scene and make assignments as</p> <p>11 necessary.</p> <p>12 Q. So documentation is important</p> <p>13 to a thorough investigation?</p> <p>14 A. Documentation is important to a</p> <p>15 criminal investigation, yes.</p> <p>16 Q. I didn't ask whether it was</p> <p>17 important to a criminal investigation,</p> <p>18 particularly. I'm just talking just broadly,</p> <p>19 is documentation important to a thorough</p> <p>20 investigation?</p> <p>21 MR. VARNADO: Object to the</p> <p>22 form.</p> <p>23 THE WITNESS: Documentation</p> <p>24 is -- can be very important to an</p> <p>25 investigation depending on where we</p>	<p>1 supervisor.</p> <p>2 Q. And throughout your period at</p> <p>3 Walgreens, were you responsible for oversight</p> <p>4 or supervision of any other employees?</p> <p>5 A. No.</p> <p>6 Q. And did you have a direct-line</p> <p>7 person to whom you reported?</p> <p>8 A. I did.</p> <p>9 Q. And who was that?</p> <p>10 A. That was Jim Odom.</p> <p>11 Q. And what was Jim Odom's title?</p> <p>12 A. He was a regional loss</p> <p>13 prevention supervisor.</p> <p>14 Q. Were you responsible for just a</p> <p>15 particular region within the country?</p> <p>16 A. I was responsible for a</p> <p>17 particular market.</p> <p>18 Q. Which market?</p> <p>19 A. Initially, I had started in</p> <p>20 Minneapolis-St. Paul. So I managed that --</p> <p>21 or worked with the manage -- the district</p> <p>22 management staff in that area for</p> <p>23 approximately two years. And then moved to</p> <p>24 Atlanta. And that market was emerging, so I</p> <p>25 was responsible for that area up until the</p>
Page 23	Page 25
<p>1 see the outcome.</p> <p>2 Q. (BY MR. ECKLUND) How would</p> <p>3 documentation not be important to an</p> <p>4 investigation?</p> <p>5 A. There are some things that are</p> <p>6 not going to be material to an investigation.</p> <p>7 Q. When you left the Air Force in</p> <p>8 1999, what did you do at that point?</p> <p>9 A. At that time I took a 90-day</p> <p>10 break and was hired with Walgreens.</p> <p>11 Q. So from 1999, you took a short</p> <p>12 vacation for about three months, and then</p> <p>13 found your footing at Walgreens, and you</p> <p>14 stayed there until 2006?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And when you started in 1999 --</p> <p>17 it was 1999 when you started Walgreens?</p> <p>18 A. Approximately 2000.</p> <p>19 Q. Approximately 2000.</p> <p>20 When you started at Walgreens</p> <p>21 in approximately 2000, what was your title</p> <p>22 when you began?</p> <p>23 A. Loss prevention supervisor.</p> <p>24 Q. And when you left in 2006 --</p> <p>25 A. It was loss prevention</p>	<p>1 time I came on with Walmart.</p> <p>2 Q. And in 2006, you transitioned</p> <p>3 from Walgreens to Walmart?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And where did you begin</p> <p>6 working within Walmart? What part of the</p> <p>7 country?</p> <p>8 A. Here.</p> <p>9 Q. In Bentonville or Rogers?</p> <p>10 A. In Rogers.</p> <p>11 I'm sorry, Bentonville. Home</p> <p>12 office.</p> <p>13 Q. Okay. So you start in</p> <p>14 Bentonville, home office, and at that point</p> <p>15 you had a somewhat different job</p> <p>16 responsibility than what you had at</p> <p>17 Walgreens; correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. How did you become</p> <p>20 trained in your new role and responsibility</p> <p>21 within Walmart?</p> <p>22 A. That was -- came from both</p> <p>23 personal knowledge as well as experience in</p> <p>24 some of the drug investigations that were</p> <p>25 completed as special agent with OSI, as well</p>

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<p>Page 30</p> <p>[REDACTED]</p>	<p>Page 32</p> <p>[REDACTED]</p>
<p>Page 31</p> <p>[REDACTED]</p>	<p>Page 33</p> <p>[REDACTED]</p>

9 (Pages 30 to 33)

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10 (Pages 34 to 37)

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Page 38

[REDACTED]

Page 40

[REDACTED]

6 Q. Do you have an understanding of
7 what the licenses for Tableau cost in 2011?
8 A. I do not.
9 Q. Do you have an understanding of
10 what a Tableau license costs today?
11 A. I do not.
12 Q. Do you know whether they would
13 be considered expensive to a company with the
14 market value of Walmart?
15 MR. VARNADO: Object to form.
16 THE WITNESS: I do not.
17 Q. (BY MR. ECKLUND) Do you think
18 that Tableau was developed by a company with
19 the hopes that they would only be able to
20 sell to companies in the top Fortune 50?
21 MR. VARNADO: Object to form.
22 THE WITNESS: That -- I could
23 not answer that question. I don't
24 know what their motivation would be.
25 Q. (BY MR. ECKLUND) Okay. But

Page 39

[REDACTED]

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1 it's not your expectation that they would
2 have wanted to sell only 100 licenses for
3 Tableau. They would want to sell it broadly
4 across the country; correct?
5 MR. VARNADO: Object to form.
6 THE WITNESS: That wouldn't be
7 my understanding. I do not understand
8 their business model.

[REDACTED]

11 (Pages 38 to 41)

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<p>Page 42</p> <p>[REDACTED]</p>	<p>Page 44</p> <p>[REDACTED]</p>
<p>Page 43</p> <p>[REDACTED]</p>	<p>Page 45</p> <p>[REDACTED]</p>

12 (Pages 42 to 45)

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MR. VARNADO: Object to form.

understanding what it can -- the

impact it can have on certain individuals or some individuals, and that is information that I've gleaned through open source media.

Q. (BY MR. ECKLUND) What's your understanding, based on your independent investigation of open source media?

A. That these particular drugs are -- there are situations of probably drug use, meaning that individuals are combining prescription medications with other substances for a variety of reasons.

Q. Okay. And what might those reasons include?

A. Those reasons could be either ignorance of the interaction, or potential interaction, and it could also be that persons are involved in this type of activity and -- from peer group pressure, and they

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also could be involved in this activity as social gatherings.

Q. Okay. And you talked about some combinations of prescription medications. Are you familiar with what's often referred to as the "trinity"?

A. That is something that I personally -- my personal knowledge of that is it also comes through open source media, yes.

Q. Okay. What's is your understanding of what the "trinity" is?

A. It is typically an opioid and one of the anti-depressants or tranquilizers, along with a muscle relaxer of some nomenclature.

Q. And what about the "holy trinity"? Are you familiar with the "holy trinity"?

MR. VARNADO: Object to form.

THE WITNESS: Only what I've read.

Q. (BY MR. ECKLUND) Okay. And again, what have you read about the holy trinity as concerns combinations of

Q. The same example. The parent gets prescribed Xanax. And do you have an understanding what Xanax is?

A. I do.

O. What's Xanax?

A. It's a tranquilizer.

Q. And do you have an understanding of what would happen if an individual was to take crushed Xanax and also drink alcohol?

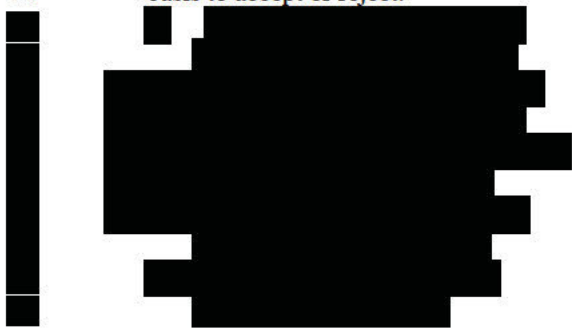
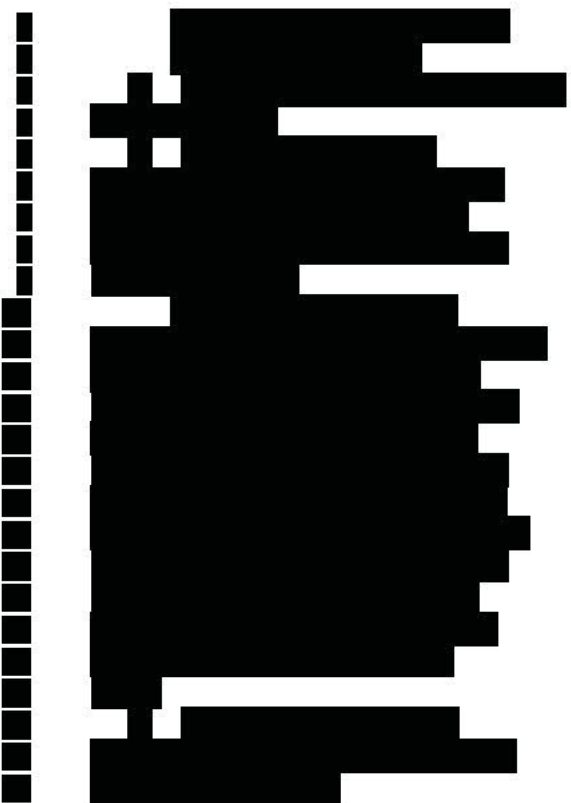
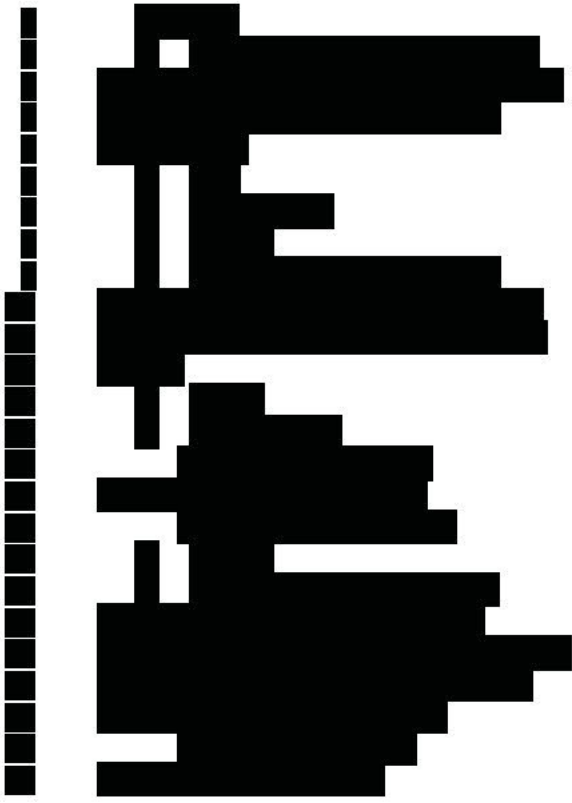
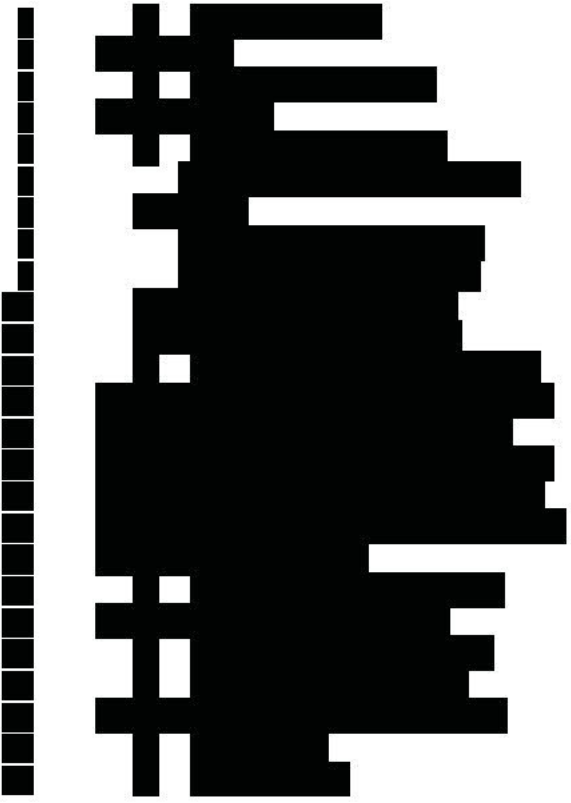
A. I personally do not have knowledge of that.

Q. I'm not asking you within your

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<p style="text-align: right;">Page 50</p> <p>1 prescription medications?</p> <p>2 A. I have read that there have</p> <p>3 been certain persons, in certain</p> <p>4 circumstances, where that was a -- that that</p> <p>5 was considered potentially problematic. And</p> <p>6 that that was a popular combination that was</p> <p>7 being seen more and more prescribed from</p> <p>8 medical doctors.</p> <p>9 Q. And you mentioned earlier that</p> <p>10 you thought that people -- the reasons people</p> <p>11 might use these particular medications could</p> <p>12 include ignorance of the interaction, or the</p> <p>13 potential interaction, peer group pressure,</p> <p>14 and also could be involved in this activity</p> <p>15 as social gatherings.</p> <p>16 Why would people be combining</p> <p>17 these medications during social gatherings?</p> <p>18 MR. VARNADO: Object to form.</p> <p>19 Q. (BY MR. ECKLUND) Based on your</p> <p>20 understanding of the social media. I mean,</p> <p>21 there's an opioid crisis. Can we agree that</p> <p>22 there's an opioid crisis?</p> <p>23 A. There is an opioid crisis.</p> <p>24 Q. When did you become familiar</p> <p>25 with the opioid crisis?</p>	<p style="text-align: right;">Page 52</p> <p>1 that there is a crisis of opioids.</p> <p>2 Opioids being a very general term in a</p> <p>3 very broad class of substances.</p> <p>4 Q. (BY MR. ECKLUND) Would you</p> <p>5 agree that there is a prescription opioid</p> <p>6 crisis in the United States today?</p> <p>7 A. I do not have the evidence or</p> <p>8 the factors in front of me to agree or</p> <p>9 disagree with that, Counsel.</p> <p>10 Q. Okay. Are you aware that</p> <p>11 between 2000 and 2014, unintentional drug</p> <p>12 overdoses in the United States increased over</p> <p>13 137 percent?</p> <p>14 A. I am familiar with numbers that</p> <p>15 come from a multiple of different open</p> <p>16 sources such as CDC, such as the DEA. But</p> <p>17 I'm not aware that -- whether -- what the</p> <p>18 root cause of those overdose deaths were,</p> <p>19 other than a broad class of opioids.</p> <p>20 Q. Okay. Were you aware that</p> <p>21 there was a 200 percent increase in overdose</p> <p>22 deaths involving opioids?</p> <p>23 MR. VARNADO: Object to form.</p> <p>24 THE WITNESS: Again, opioids is</p> <p>25 a broad class, both illicit and</p>
<p style="text-align: right;">Page 51</p> <p>1 A. My recollection goes back</p> <p>2 personally, approximately 2006.</p> <p>3 Q. 2006. And in 2006, you were</p> <p>4 already at Walmart? You were joining</p> <p>5 Walmart?</p> <p>6 A. I was.</p> <p>7 Q. Okay. So you arrived on the</p> <p>8 scene and you were aware that there's a</p> <p>9 crisis of opioids at that point?</p> <p>10 A. I was aware personally that</p> <p>11 there was communications in media of an</p> <p>12 opioid crisis.</p> <p>13 Q. Did you disagree with the media</p> <p>14 coverage concerning the opioid crisis?</p> <p>15 A. At that particular point in</p> <p>16 time, I didn't have evidence to agree or</p> <p>17 disagree.</p> <p>18 I am looking -- I am looking at</p> <p>19 and focusing on the potential for that.</p> <p>20 Q. All right. Since 2006, have</p> <p>21 you come to a point where you now would agree</p> <p>22 that there is in fact an opioid crisis or</p> <p>23 epidemic in the United States?</p> <p>24 MR. VARNADO: Object to form.</p> <p>25 THE WITNESS: I would agree</p>	<p style="text-align: right;">Page 53</p> <p>1 prescription.</p> <p>2 Q. (BY MR. ECKLUND) Were you</p> <p>3 aware that more than half a million deaths</p> <p>4 were due to prescription overdoses?</p> <p>5 A. I'm not familiar with that</p> <p>6 particular number related to specifically</p> <p>7 prescription overdoses.</p> <p>8 Q. Okay.</p> <p>9 In 2015, there were 47,000</p> <p>10 overdose deaths. And there were more than</p> <p>11 28,000 deaths involving opioids including</p> <p>12 heroin. But within that same year there were</p> <p>13 19,000 involving prescription opioids.</p> <p>14 Were you aware of that?</p> <p>15 MR. VARNADO: Object to form.</p> <p>16 THE WITNESS: I don't recall</p> <p>17 reading that.</p> <p>18 Q. (BY MR. ECKLUND) Okay.</p> <p>19 A. Specifically.</p> <p>20 Q. In your investigations online,</p> <p>21 have you ever taken the time to read the CDC,</p> <p>22 National Center for Health Statistics and</p> <p>23 Morbidity Mortality Report from</p> <p>24 January 1st, 2016?</p> <p>25 A. I did.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Q. You did? That's where these 2 numbers are coming from. 3 A. (Witness nods.) 4 Q. Do you have any reason to 5 dispute any of the CDC's statistics? 6 A. I'm not in a position to 7 dispute or support CDC's outcome or 8 statistics. 9 Q. So you're not willing to accept 10 them, but you're also not in a position to 11 dispute them? 12 MR. VARNADO: Object to form. 13 THE WITNESS: I didn't say I 14 didn't accept them. I said I have no 15 basis to accept or reject.</p> 	<p style="text-align: right;">Page 56</p> 
<p style="text-align: right;">Page 55</p> 	<p style="text-align: right;">Page 57</p> 

15 (Pages 54 to 57)

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<p style="text-align: right;">Page 58</p> <p>[REDACTED]</p>	<p style="text-align: right;">Page 60</p> <p>[REDACTED]</p>
<p style="text-align: right;">Page 59</p> <p>[REDACTED]</p> <p>14 (Interruption with hold music.)</p> <p>15 MR. ECKLUND: So for the</p> <p>16 benefit of the record, we've lowered</p> <p>17 the volume on the speakerphone</p> <p>18 because, once again, we've been placed</p> <p>19 on hold and we'll just note for the</p> <p>20 record that it's the same hold music,</p> <p>21 so we suspect it's more than likely</p> <p>22 the same individual or law firm.</p> <p>[REDACTED]</p>	<p style="text-align: right;">Page 61</p> <p>[REDACTED]</p>

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[REDACTED]

Page 64

[REDACTED]

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[REDACTED]

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[REDACTED]

13 MR. ECKLUND: You going to ask
14 them to take attendance?

15 MR. CECCHI: Yeah.

16 Should we take an attendance of
17 all the attendees on the phone while
18 the hold music is playing and then
19 we'll do our own little diversion
20 investigation here and see who's on
21 hold?

22 Everyone on the phone, please
23 put your name on the record again.
24 You're going to have to speak up
25 because it's hard to hear you.

17 (Pages 62 to 65)

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1 MR. INNES: This is
2 Michael Innes for plaintiffs.
3 MR. ANDERSON: Jon Anderson,
4 AmerisourceBergen.
5 MS. HOSMER: Heather Hosmer,
6 Arnold & Porter.
7 MS. MARINO: Christina Marino,
8 Tucker Ellis.
9 MR. BOWER: Zach Bower, Carella
10 Byrne.
11 MR. CECCHI: And, Zach, stop.
12 Who was the name before you? That was
13 hard to hear.
14 MS. MARINO: Christina Marino,
15 tucker Ellis.
16 MR. CECCHI: Anyone else?
17 MR. HALPERN: Rick Halpern,
18 Marcus & Shapira.
19 MR. SNYDER: Ryan Snyder,
20 O'Melveny & Myers.
21 MR. ECKLUND: Jon Anderson?
22 MR. ANDERSON: I'm on there.
23 I've already announced myself.
24 MR. VARNADO: All right. Thank
25 you, everybody. We're going to try to

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[REDACTED]

Page 67

1 press on here.
2 Q. (BY MR. ECKLUND) It's always
3 unique, every deposition.
4 A. The modern wonders of
5 technology.
6 Q. That's right.
[REDACTED]

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[REDACTED]

18 (Pages 66 to 69)

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<p>Page 70</p> <p>[REDACTED]</p>	<p>Page 72</p> <p>[REDACTED]</p>
<p>Page 71</p> <p>[REDACTED]</p>	<p>1</p> <p>Page 73</p> <p>[REDACTED]</p>

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[REDACTED]

15 MR. VARNADO: Counsel, we've
16 been going close to an hour and a half.

17 MR. ECKLUND: That's fine.

18 MR. VARNADO: Take a little
19 break? Doesn't have to be long.

20 VIDEOGRAPHER: 9:54. We are
21 off the video record.

22 (Recess taken, 9:54 a.m. to
23 10:07 a.m.)

24 THE VIDEOGRAPHER: 10:07. We
25 are on the video record.

21 (Pages 78 to 81)

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1 Q. (BY MR. ECKLUND) Welcome back,
2 Mr. Beam. You understand you're still under
3 oath?

4 A. I do.

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
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23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 not proven, just suspected, to DEA?

2 MR. VARNADO: Object to form.

3 THE WITNESS: That information

4 was reported if there were losses

5 connected. But in terms of referring

6 for local law enforcement, we did not

7 refer to local law enforcement unless

8 there is prosecutable evidence there.

9 Q. (BY MR. ECKLUND) I was
10 specifically asking about DEA. So it would
11 have been reported to DEA. And then as far
12 as referral for prosecution asks you
13 employees who were involved, that was only
14 when you felt that the evidence was clear?
15 That there was prosecutable evidence?

16 A. Yes.

17 Q. Okay.

18 A. And the -- in reporting to the
19 DEA, each one of these investigations are
20 coordinated through compliance, who completes
21 the 106s, per their guidelines. And per
22 their instructions.

23 What we do is submit the facts
24 to local law enforcement, our state law
25 enforcement, for additional action to include

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 Q. (BY MR. ECKLUND) You mentioned
6 that sometimes good people make bad
7 decisions. Did you report any of those good
8 people who made these bad decisions to local
9 law enforcement?

10 A. We did.

11 Q. How many?

12 A. In fact, every investigation
13 where diversion is proven, we have the
14 evidence, that information is referred for
15 prosecution and police are notified in each
16 individual case.

17 Q. Okay. So in every instance
18 where you have sufficient information, where,
19 using your term, where diversion is proven,
20 and where you have the evidence, that
21 information is referred to prosecution and
22 police are notified in each individual case.

23 Did you -- when you had
24 occasions to suspect diversion, did you refer
25 that information, whether it was proven or

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1 prosecution.

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
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22 (Pages 82 to 85)

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<p>Page 86</p> <p>[REDACTED]</p>	<p>Page 88</p> <p>[REDACTED]</p>
<p>Page 87</p> <p>[REDACTED]</p>	<p>Page 89</p> <p>[REDACTED]</p>

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<p>Page 91</p> <p>[REDACTED]</p>	<p>Page 93</p> <p>[REDACTED]</p>

24 (Pages 90 to 93)

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<p>Page 95</p> 	<p>Page 97</p> <p>1</p> 

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<p>Page 99</p> <p>[REDACTED]</p>	<p>Page 101</p> <p>[REDACTED]</p>

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<p>Page 111</p> <p>[REDACTED]</p>	<p>Page 113</p> <p>[REDACTED]</p>

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<p>Page 115</p> <p>[REDACTED]</p>	<p>Page 117</p> <p>[REDACTED]</p>

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<p>Page 127</p> <p>[REDACTED]</p>	<p>Page 129</p> <p>[REDACTED]</p>

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<p>Page 131</p> <p>[REDACTED]</p>	<p>Page 133</p> <p>[REDACTED]</p>

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35 (Pages 134 to 137)

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Page 138

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Page 140

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Page 139

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Page 141

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36 (Pages 138 to 141)

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<p>Page 142</p> <p>[REDACTED]</p>	<p>Page 144</p> <p>[REDACTED]</p>
<p>Page 143</p> <p>[REDACTED]</p>	<p>Page 145</p> <p>[REDACTED]</p>

37 (Pages 142 to 145)

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<p>Page 150</p> <p>[REDACTED]</p>	<p>Page 152</p> <p>[REDACTED]</p>
<p>Page 151</p> <p>[REDACTED]</p>	<p>Page 153</p> <p>[REDACTED]</p>

39 (Pages 150 to 153)

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Page 154

[REDACTED]

[REDACTED]

19 MR. ECKLUND: Why don't we take
20 that break.
21 MR. VARNADO: Sure.
22 VIDEOGRAPHER: 11:26. We are
23 off the video record.
24 (Recess taken, 11:26 a.m. to
25 11:38 a.m.)

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[REDACTED]

[REDACTED]

Page 155

1
2

THE VIDEOGRAPHER: 11:38. We
are on the video record.

[REDACTED]

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40 (Pages 154 to 157)

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41 (Pages 158 to 161)

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Page 162

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Page 164

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Page 163

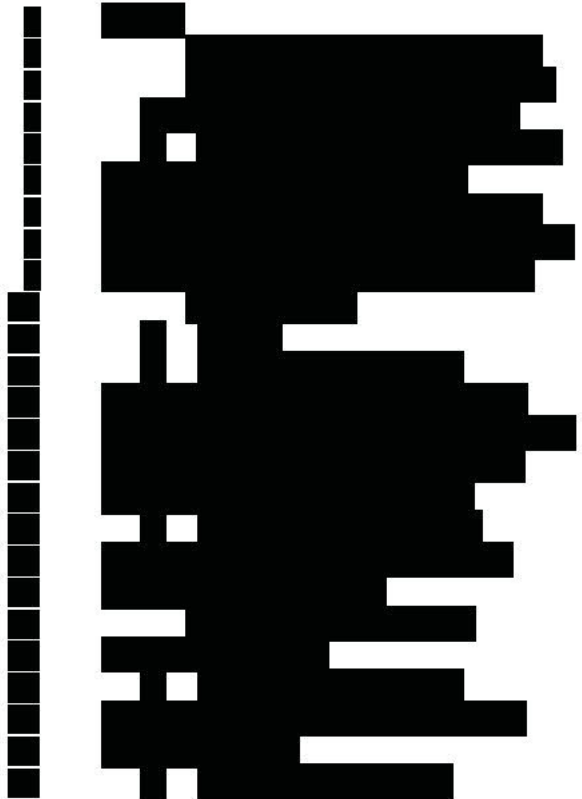
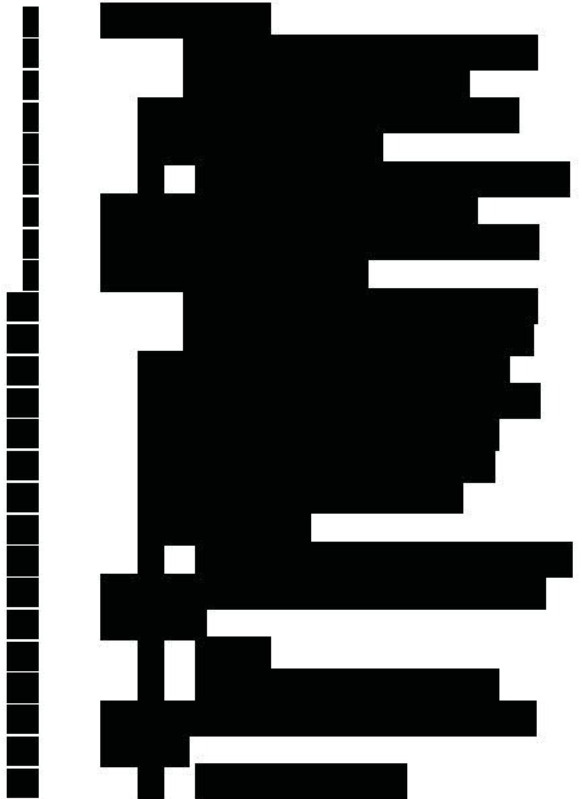
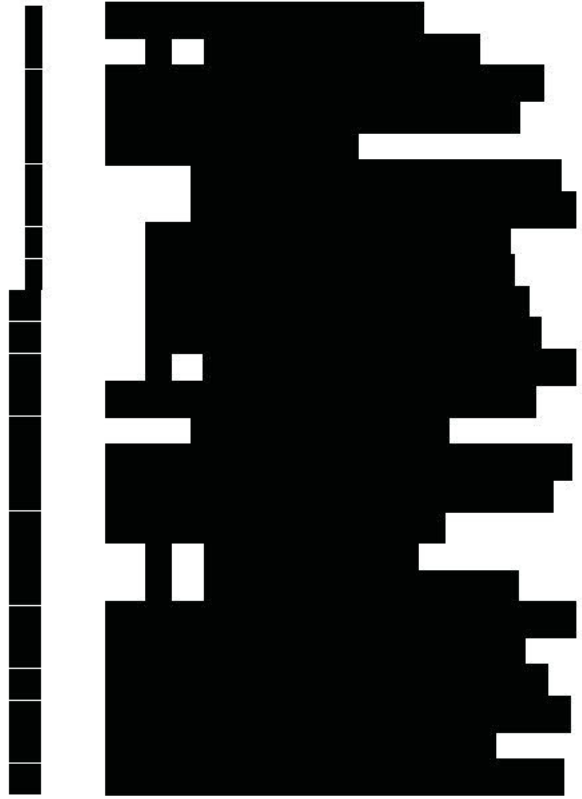
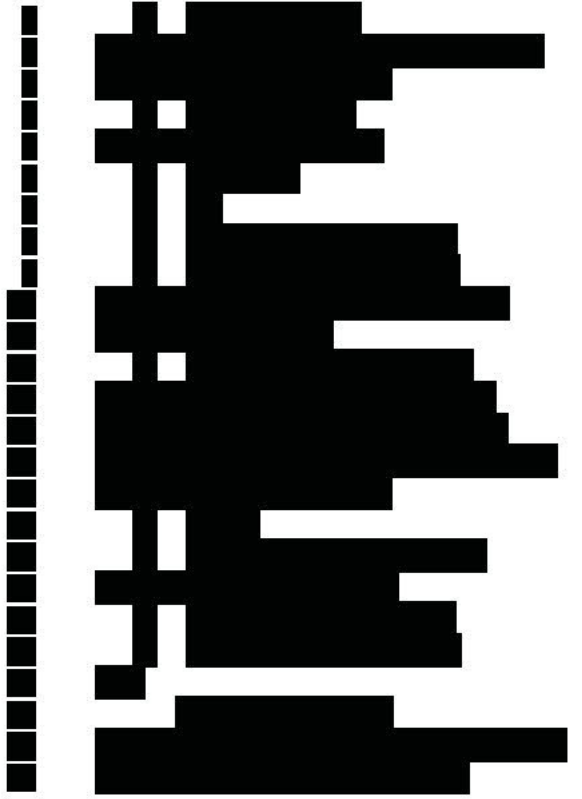
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Page 165

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42 (Pages 162 to 165)

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<p>Page 166</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, black rectangular marks, possibly representing a list or a margin.	<p>Page 168</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, black rectangular marks, possibly representing a list or a margin.
<p>Page 167</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, black rectangular marks, possibly representing a list or a margin.	<p>Page 169</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, black rectangular marks, possibly representing a list or a margin.

43 (Pages 166 to 169)

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<p>Page 170</p> <p>[REDACTED]</p>	<p>Page 172</p> <p>[REDACTED]</p>
<p>Page 171</p> <p>[REDACTED]</p>	<p>Page 173</p> <p>[REDACTED]</p>

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Page 177

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Page 184

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Page 186

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Page 188

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48 (Pages 186 to 189)

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<p>Page 190</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a list or a margin.	<p>Page 192</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a list or a margin.
<p>Page 191</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a list or a margin.	<p>Page 193</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a list or a margin.

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Page 194

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Page 196

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Page 195

[REDACTED]

Page 197

[REDACTED]

50 (Pages 194 to 197)

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Page 198

[REDACTED]

Page 200

1 A. Thank you.
 2 Q. I hope you enjoyed your lunch.
 3 So, I just wanted to turn your
 4 attention back to this composite exhibit. If
 5 you recall, this is what we had talked about
 6 earlier. This was what was marked as
 7 Exhibit 1 in Miranda Johnson's deposition.
 8 And do you recall we went
 9 through these time periods. We assembled
 10 each of the Bates range documents that were
 11 identified in Walmart responses in this
 12 document. And I had a couple of questions
 13 about this particular document for you.
 14 It bears Bates stamp 11106.
 15 Do you see this document?
 16 There we go. Okay. Here's the question I
 17 have for you.

[REDACTED]

Page 199

3 MR. VARNADO: We're getting
 4 close to 12:30. Whenever you are
 5 ready for a break. No rush.
 6 MR. ECKLUND: When you're
 7 hungry or want to take a break, just
 8 let me know.
 9 THE WITNESS: Certainly.
 10 Are you ready?
 11 MR. VARNADO: Are you ready
 12 now?
 13 THE WITNESS: Are we starting
 14 with a new document? Then I think
 15 that would be a perfect time.
 16 MR. VARNADO: Sounds good.
 17 That's fine.
 18 VIDEOGRAPHER: 12:26. We are
 19 off the video record.
 20 (Recess taken, 12:26 p m. to
 21 1:02 p m.)
 22 VIDEOGRAPHER: 1:02. We are on
 23 the video record.
 24 Q. (BY MR. ECKLUND) Welcome back,
 25 Mr. Beam.

Page 201

[REDACTED]

51 (Pages 198 to 201)

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Page 204

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Page 203

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Page 205

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Page 212

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Page 211

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Page 213

[REDACTED]

54 (Pages 210 to 213)

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[REDACTED]

Page 216

1 MR. CECCHI: 8089. It's
2 Deposition Exhibit 5.
3 MR. ECKLUND: Correct.
4 And what I was curious about
5 was one of the prior exhibits, which
6 is Bates stamp 57259.
7 It's the one with the big
8 redacted privilege block.
9 Okay. All right.
10 Now --
11 MR. VARNADO: Exhibit 2, for
12 the record.
13 MR. ECKLUND: Exhibit 2, for
14 the record. Thank you.

[REDACTED]

Page 215

[REDACTED]

11 MR. VARNADO: What page number?
12 MR. ECKLUND: It's --
13 MR. VARNADO: Are you reading
14 from Exhibit 5?
15 MR. ECKLUND: No, no. It's one
16 of the prior exhibits. You can go
17 back.
18 MR. CECCHI: Could you read the
19 Bates ranges of Exhibit 5 that's
20 been -- that we're talking about? I'm
21 just confused what exhibit we're
22 looking at.
23 Read the Bates ranges into the
24 record. I just want to make sure.
25 MR. ECKLUND: 8089.

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[REDACTED]

55 (Pages 214 to 217)

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<p>Page 218</p> <p>[REDACTED]</p>	<p>Page 220</p> <p>[REDACTED]</p>
<p>Page 219</p> <p>[REDACTED]</p>	<p>Page 221</p> <p>[REDACTED]</p>

56 (Pages 218 to 221)

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<p>Page 223</p> <p>[REDACTED]</p>	<p>Page 225</p> <p>[REDACTED]</p>

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Page 228

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59 (Pages 230 to 233)

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<p>Page 235</p> <p>[REDACTED]</p>	<p>Page 237</p> <p>[REDACTED]</p>

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Page 239

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Page 241

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61 (Pages 238 to 241)

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<p>Page 243</p> <p>[REDACTED]</p>	<p>Page 245</p> <p>[REDACTED]</p>

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Page 247

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Page 249

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<p>Page 251</p> <p>[REDACTED]</p>	<p>Page 253</p> <p>[REDACTED]</p>

64 (Pages 250 to 253)

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<p>Page 254</p> <p>[REDACTED]</p>	<p>Page 256</p> <p>[REDACTED]</p>
<p>Page 255</p> <p>[REDACTED]</p>	<p>Page 257</p> <p>[REDACTED]</p>

65 (Pages 254 to 257)

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<p>Page 258</p> <p>[REDACTED]</p>	<p>Page 260</p> <p>[REDACTED]</p>
<p>Page 259</p> <p>[REDACTED]</p>	<p>Page 261</p> <p>[REDACTED]</p>

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Page 265

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67 (Pages 262 to 265)

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<p>Page 267</p> <p>[REDACTED]</p>	<p>Page 269</p> <p>[REDACTED]</p>

68 (Pages 266 to 269)

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<p>Page 270</p> <p>[REDACTED]</p>	<p>Page 272</p> <p>[REDACTED]</p>
<p>Page 271</p> <p>[REDACTED]</p>	<p>Page 273</p> <p>[REDACTED]</p>

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Page 278

[REDACTED]

Page 280

[REDACTED]

15 MR. VARNADO: We've been going
16 about an hour and 20 minutes.

17 MR. ECKLUND: We can take a
18 break.

19 MR. VARNADO: Yeah.

20 VIDEOGRAPHER: 2:28. We're off
21 the video record.

22 (Recess taken, 2:29 p.m. to
23 2:41 p.m.)

24 VIDEOGRAPHER: 2:41. We are on
25 the video record.

Page 279

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Page 281

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71 (Pages 278 to 281)

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<p>Page 282</p> <p>[REDACTED]</p>	<p>Page 284</p> <p>[REDACTED]</p>
<p>Page 283</p> <p>[REDACTED]</p>	<p>Page 285</p> <p>[REDACTED]</p>

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73 (Pages 286 to 289)

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<p>Page 290</p> <p>[REDACTED]</p>	<p>Page 292</p> <p>[REDACTED]</p>
<p>Page 291</p> <p>[REDACTED]</p>	<p>Page 293</p> <p>[REDACTED]</p>

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<p>Page 298</p> <p>[REDACTED]</p>	<p>Page 300</p> <p>[REDACTED]</p>
<p>Page 299</p> <p>[REDACTED]</p>	<p>Page 301</p> <p>[REDACTED]</p>

76 (Pages 298 to 301)

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<p>Page 302</p> <p>[REDACTED]</p>	<p>Page 304</p> <p>[REDACTED]</p>
<p>Page 303</p> <p>[REDACTED]</p>	<p>Page 305</p> <p>[REDACTED]</p>

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Page 312

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80 (Pages 314 to 317)

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<p>Page 318</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, evenly spaced rectangular marks, possibly a scanning artifact or a placeholder for a list.	<p>Page 320</p>  A large rectangular area of the page is completely blacked out, indicating redacted content. To the left of this area is a vertical column of small, evenly spaced rectangular marks, possibly a scanning artifact or a placeholder for a list.
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81 (Pages 318 to 321)

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83 (Pages 326 to 329)

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<p>Page 331</p> <p>[REDACTED]</p>	<p>Page 333</p> <p>[REDACTED]</p>

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Page 340

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Page 339

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Page 341

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86 (Pages 338 to 341)

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Page 342

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Page 344

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Page 343

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Page 345

[REDACTED]

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Page 346

25 [REDACTED]

MR. VARNADO: We've been going

Page 348

[REDACTED]

Page 347

1 about another hour and 15. Take
2 another break.
3 MR. ECKLUND: Sure.
4 VIDEOGRAPHER: 3:56. We are
5 off the video record.
6 (Recess taken, 3:57 p m. to
7 4:05 p m.)
8 VIDEOGRAPHER: 4:05. We are on
9 the video record.

[REDACTED]

Page 349

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88 (Pages 346 to 349)

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<p>Page 350</p> <p>[REDACTED]</p>	<p>Page 352</p> <p>[REDACTED]</p>
<p>Page 351</p> <p>[REDACTED]</p>	<p>Page 353</p> <p>[REDACTED]</p>

89 (Pages 350 to 353)

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<p>Page 354</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, evenly spaced black squares, likely a scanning artifact or a placeholder for a table of contents.	<p>Page 356</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, evenly spaced black squares, likely a scanning artifact or a placeholder for a table of contents.
<p>Page 355</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, evenly spaced black squares, likely a scanning artifact or a placeholder for a table of contents.	<p>Page 357</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, evenly spaced black squares, likely a scanning artifact or a placeholder for a table of contents.

90 (Pages 354 to 357)

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<p>Page 358</p> <p>[REDACTED]</p>	<p>Page 360</p> <p>[REDACTED]</p>
<p>Page 359</p> <p>[REDACTED]</p>	<p>Page 361</p> <p>[REDACTED]</p>

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Page 365

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Page 366

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Page 368

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23
24
25

MR. ECKLUND: Let's take a
five-minute break.
VIDEOGRAPHER: 4:28. We are

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[REDACTED]

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1 off the video record.
2 (Recess taken, 4:28 p.m. to
3 4:39 p.m.)
4 VIDEOGRAPHER: 4:39. We are on
5 the video record.
6 Q. (BY MR. ECKLUND) Okay.
7 Mr. Beam, I have a few questions and I just
8 wanted to make sure we have clear testimony
9 on these issues.

[REDACTED]

93 (Pages 366 to 369)

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<p>Page 370</p> <p>[REDACTED]</p>	<p>Page 372</p> <p>[REDACTED]</p>
<p>Page 371</p> <p>[REDACTED]</p>	<p>Page 373</p> <p>[REDACTED]</p>

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Page 376

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Page 375

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Page 377

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95 (Pages 374 to 377)

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Page 378

[REDACTED]

Page 380

[REDACTED]

Page 379

[REDACTED]

Page 381

[REDACTED]

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Page 384

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action

Dated: 1/18/19

Page 385

MR. ECKLUND: Mr. Beam, thank you for your time today. I have no further questions.

MR. VARNADO: No further questions from Walmart.

VIDEOGRAPHER: 4:55 p.m. We are off the video record. This concludes the video deposition of Greg Beam.

(Proceedings recessed at
4:55 p.m.)

--o0o--

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

98 (Pages 386 to 388)